

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 219
1926*

ISABELLE JOHNSON

VS.

CHARLES JOHNSON

908 McCulloch St

BILL FOR DIVORCE.

B 30686

Mr. Clerk:-

(1)
Please file.

Javis T Evans
ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

FD 17 May 1926

ISABELLE JOHNSON : IN THE CIRCUIT COURT

VS. : OF

CHARLES JOHNSON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Charles Johnson, on the 15th day of September, 1922 and with whom she resided until on or about the 21st day of December, 1924.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Charles Johnson.
3. That the said Charles Johnson has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women whose names are unknown to your Oratrix and said offense has not been condoned by your Oratrix.
4. That your Oratrix has not lived or co-habited with said defendant since she discovered his said adulteries.
5. That there are no children born as issue of said marriage.
6. That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

7. Your Oratrix states that she is destitute and without means of financing the expenses of this suit and that she is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her some amount as alimony pendente lite and some amount to compensate her solicitors. The defendant is employed and earns thirty dollars per week.

8. TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Charles Johnson.
- (b) Alimony pendente lite.
- (c) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Charles Johnson, commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.



ATTORNEYS FOR PLAINTIFF

9553

B 219
1926

Ct. Ct.

Docket No.

Johnson

1717
main
m/s

Johnson

908 Mc Gowan

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Paid
B 30686
(27)

Filed

26 May, 1926
Davis + Evans.

SOLICITOR

10

Summoned and a copy of the Process left with
the defendant. John E. Potee Sheriff

(Duchy)
5/18/26

Recd \$0.80

EQUITY SUBPOENA

The State of Maryland

DP 5/18/26 (10)

To

Charles Johnson
908 McCulloh St

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law, beginning on the second Monday of June next cause an appearance to be entered for you and your answer to be filed to the complaint of

Isabelle Johnson.

against you exhibited in the Circuit Court of Baltimore City,

HEREOF fail not, as you will answer the contrary at your peril.

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore

City, the 10 day of May 1926
Issued the 17 day of May, in the year 1926

Chas R Whiteford

Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

B Docket 219
1926

CIRCUIT COURT.

Isabelle Johnson
vs.

Charles Johnson
908 McCulloch Street

Order for Alimony

Pendente Lite

ORDER

B No. 30686

\$30 per () (3) (4)
no children

Fd: 17 May 1926
15" July 1926

Copy of the within Order of Court served
on Charles Johnson on the 22nd day of
May 1926 in presence of Dennis Mitchell.

John E. Potee
Sheriff

New \$0.50

Isabelle Johnson

vs.

Charles Johnson

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY

May

TERM, 1926

ORDERED BY THE COURT this 17 day of May 1926

that the defendant Charles Johnson

pay to the plaintiff Isabelle Johnson

the sum of Ten

Dollars per week, during the continuance of this suit, accounting from the

day of May 1926 to the said plaintiff Isabelle Johnson

as alimony, *pendente lite* unless cause to the contrary be shown on or before the

day of ~~May~~ June 1926 provided a copy of this Order be served on the said defendant

Charles Johnson on or before the 25th

day of May 1926

James O. Gorter

TRUE COPY—TEST:

CLERK

A copy of the foregoing order having been served upon the defendant as is shown by the Sheriff's return hereon, and no cause to the contrary having been shown, it is this..... 15th day of July..... 1926, ordered by the Circuit Court of Baltimore City that the same be, and it is hereby made absolute and final.

.....W. W. Bond.....

IN THE CIRCUIT COURT
of
BALTIMORE CITY.

66B
219

ISABELL JOHNSON

VS.

CHARLES JOHNSON

Answer to
Bill of Complaint and order.

B 30686

Mr. Clerk,

(5)

Please file, etc.;

Allen Eli Cohan
Solicitor for Defendant.

Allen Eli Cohan
~~XXXXXXXXXXXX~~
ATTORNEY AT LAW
549 EQUITABLE BUILDING
BALTIMORE, MD.

FILED

17th May 1939

ISABELL JOHNSON : IN THE
 VS. : CIRCUIT COURT
 CHARLES JOHNSON : OF
 BALTIMORE CITY.

TO THE HONORABLE: THE JUDGE OF SAID COURT:

THE ANSWER OF Charles Johnson, defendant, to the Bill of Complaint and to the order passed thereon respectfully unto your Honor as follows.

1. That the defendant admits the averments in the first paragraph.
2. That the defendant denies the allegations contained in paragraph Two, Three, and Four, and demands strict proof thereof.
3. That the defendant admits the averments in the Fifth and Sixth paragraph.
4. Answering paragraph seven of said Bill, this defendant denies that he earns or is able to earn any such sum, as is set forth in said paragraph, but on the other hand that he is ill and out of employment.

And having fully answered, this defendant prays that the order heretofore passed be rescinded and the Bill of Complaint hence dismissed, with its proper costs.

Allen L. Lohan
 Solicitor for Defendant.

Charles J. Johnson
 Defendant

STATE OF MARYLAND, BALTIMORE CITY, To wit:

I hereby certify, That on this 17th day of May, 1929, before me the subscriber, Notary Public of the State of Maryland, in and for Baltimore City, aforesaid personally appeared Charles Johnson, defendant in the aforementioned Bill of Complaint, and he made oath in due form of Law that the matters and facts stated in the foregoing Answer are true to the best of his information, knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL.

James R. Jackson
 NOTARY PUBLIC.

IN THE CIRCUIT COURT
of
BALTIMORE CITY.

B 219
1929

ISABELL JOHNSON

versus

CHARLES JOHNSON
and
CHARLES JOHNSON

versus

ISABELL JOHNSON

CROSS-BILL OF COMPLAINT

Geo. W. Evans will

Mr. Clerk; accept
Please file, etc.

Allan Eli Cohan
Solicitor for Complainant in
Cross-Bill.

B 30686

Allan Eli Cohan
ATTORNEY AT LAW
549 EQUITABLE BUILDING
BALTIMORE, MD.

FILED

17th May 1929

ISABELL JOHNSON	:	IN THE
versus	:	
CHARLES JOHNSON	:	CIRCUIT COURT
and	:	
CHARLES JOHNSON	:	OF
versus	:	
ISAPLIL JOHNSON	:	BALTIMORE CITY.

GROSS-BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGE OF SAID COURT:

1. Your Orator, complaining, says: that on _____, the defendant, Isabell Johnson, filed her Bill of Complaint, against your Orator, wherein she charged him with having committed adultery, and prayed for a Divorce a vinculo matrimonii from him, and your Orator has, by his answer, shown that the said defendant is not entitled to any such relief, and that she deserted and abandoned him without any justification whatsoever.

2. That your Orator was married, to the defendant, September 15, 1922, in Baltimore City, Maryland by and with a religious ceremony.

3. That he has been a resident of the City of Baltimore, and State of Maryland, for more than two years preceding the filing of this suit.

4. That there are no children born as the result of the said marriage.

5. That although the conduct of your Orator towards his wife, the said Isabell Johnson, has always been that of a kind affectionate husband, the said Isabell Johnson has without any just cause or reason abandoned and deserted him, and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly for at least three years, and is deliberate and final, and the separation of the parties is beyond any reasonable expectation of reconciliation.

6. That since the day of separation December 21, 1924, your Orator has not cohabited with the Defendant Isabell Johnson.

TO THE LAD, THEREFORE:

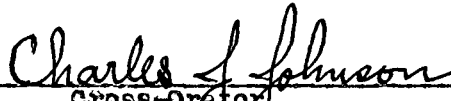
1. That your Orator may be divorced a vinculo matrimonii from the said defendant, Isabell Johnson.

2. That he may have such other and further relief as his case may require.

MAY IT PLEASE YOUR HONOR to grant unto your Orator the Writ of Subpoena directed to the said Isabell Johnson, residing at 1120 Madison Ave. Baltimore, Maryland, commanding her to be and appear in this Honorable Court, either in person or by solicitor, on or before some certain day to be named therein, and answer the premises and abide by and perform such decree or decrees as may be passed therein.

AND, as in duty bound, etc.


Solicitor for Orator in Cross-Bill


Cross-Orator

P 115

Ct. Ct.

B-219

192 6

Docket No.

Isabell Johnson

vs.

Charles Johnson

Charles Johnson

vs.

Isabell Johnson

1120 Madison

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro 1070

No.

B-30686

(7)

Filed

27 May

1929

Allan Eli Cohan

SOLICITOR

10

Summoned Isabell Johnson and a copy of the Process with a copy of the Bill of Complaint served on the defendant on the 17th day of May 1929 in presence of August J. Bieby John. E. Potee Sheriff Dec 1/10

Wd 50 4 076 41

RECEIVED

EQUITY SUBPOENA

The State of Maryland

On Isabell Johnson,

1120 Madison Avenue,

serve on Geo. W. Evans, Solicitor

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law, beginning on the second Monday of June Cross-bill of next cause an appearance to be entered for you and your answer to be filed to the complaint of

Charles Johnson

against you exhibited in the Circuit Court of Baltimore City.

HEREOF fail not, as you will answer the contrary at your peril.

Samuel K. Dennis

WITNESS, the Honorable ~~James H. H. H. H.~~, Chief Judge of the Supreme Bench of Baltimore

City, the 13th day of May 1929

Issued the 17th day of May, in the year 19 29

Chas. R. Wadford Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

66 219

IN THE
CIRCUIT COURT
of
BALTIMORE CITY
219
1926 *B 66*

ISABELLE JOHNSON
VS
CHARLES JOHNSON
AND Cross Bill
CHARLES JOHNSON
VS
ISABELLE JOHNSON

B 30/1926
Answer to Cross Bill
of Complaint

MR. CLERK:

Please file, etc

George Evans
Attorney for plaintiff in
original bill-defendant in
Cross Bill

GEORGE W. EVANS
ATTORNEY AT LAW
503 ST. PAUL STREET
BALTIMORE, MD.
EVANS
ATTORNEYS AT LAW

Fd 10 June 1929

ISABELLE JOHNSON

*

IN THE

VS

*

CIRCUIT COURT

CHARLES JOHNSON

*

and Cross Bill

of

*

CHARLES JOHNSON

BALTIMORE CITY

*

VS

ISABELLE JOHNSON

*

* * * * *

TO THE HONCRABLE, THE JUDGE OF SAID COURT:

The answer of your Respondent to the Cross Bill of Complaint in the above entitled cause says:


FIRST: Your Respondent admits that part of the first paragraph alleging that she filed a bill for a divorce a vinculo matrimonii, but denies with great emphasis that she deserted the plaintiff in the Cross Bill and demands proof thereof.

SECOND: Your respondent admits the allegations contained in the second, third and fourth paragraphs of the bill of complaint.

THIRD: Your respondent denies with great emphasis all the allegations contained in the fifth paragraph of the Bill of Complaint.

FOURTH: Your respondent neither admits nor denies the allegations contained in the sixth paragraph of the Bill of Complaint.

HAVING fully answered the Cross Bill in so far as she is advised, your respondent prays that the same be dismissed with its proper cost.


Attorney for plaintiff in original
bill-Defendant in Cross Bill

Circuit Court

66B

1926

Docket..219

Isabelle Johnson
Charles^v Johnson
Charles Johnson
vs.
Isabelle Johnson

Lacey
Petition for leave to take
Testimony and Order of
Court thereon

B No. 30686

19

Filed. 30th July 1926

Isabelle Johnson
Charles Johnson
Charles Johnson
vs.
Isabelle Johnson

IN THE
Circuit Court
OF
BALTIMORE CITY

**To the Honorable the Judge of the
Circuit Court of Baltimore City:**

THE PETITION OF Charles Johnson, Complainant
in Cross Bill

in this case, respectfully shows that he desire to take testimony in this case, and
respectfully pray that leave be granted him to do so before one of the Standing
Examiners of this Court.

Allen D. Blanton
Solicitor for Complainant
in Cross Bill.

ORDERED, this 30th day of July 1927, that
leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the
Standing Examiners of this Court.

Joseph N. Newman

Ewans'

Circuit Court

66B

1926

Docket 219

Isabelle Johnson

v

Charles Johnson

Charles Johnson

vs.

Isabelle Johnson

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

Alvan Plibon

Solicitor for Plaintiff.

- Cross Bill

No. B 30686

(11)

Filed 3 Dec 1929

Isabelle Johnson
Charles Johnson
Charles Johnson
vs.
Isabelle Johnson

In the Circuit Court
of Baltimore City

July TERM, 1929

To the Honorable

Judge of Said Court:

The above cause is respectfully submitted for
decree and the 43rd General Equity Rule is hereby waived.

Allan Blanton

Solicitor for Plaintiff,
Cross Bell

Georgewar

Solicitor for Defendant,
in Cross Bell

Circuit Court

66 B
1926

Docket No. 219

Isabelle Johnson
vs

Charles Johnson
Charles Johnson

vs.

Isabelle Johnson

Order of Reference
and Report

B 30686
Lyon
B No. 30686
(12)

Order Filed 3 day of Dec 1929

Report Filed 12 day of Dec 1929

Isabelle Johnson

Charles Johnson

Charles Johnson

vs.

Isabelle Johnson

IN THE

Circuit Court

OF

BALTIMORE CITY

July

Term, 1929

This case being submitted, without argument, it is ordered by the Court, this 3rd day of December, 1929, that the same be and it is hereby referred to William P. Lyons, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

William P. Lyons

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the wife against her husband on the ground of adultery. Code Art. 16; Sec. 37-42.

Defendant summoned and answered.

Cross bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of abandonment. Code Art. 16; Sec. 37-42.

Defendant summoned and answered cross bill.

Residence of the plaintiff in the cross bill in Baltimore City for more than two years prior to the filing of the bill proved.

The marriage proved.

Abandonment of the plaintiff in the cross bill by the defendant in the cross bill uninterruptedly for three years, its finality and the irreconcilability of the parties proved.

Thirty days have elapsed since the filing of the cross bill.

Case submitted for decree and 41st General Equity Rule waived.

Case ready for decree.

William P. Lyons
Auditor and Master.

December 5, 1929.

111
CIRCUIT COURT

B -219
1926 No. Docket

ISABELLE JOHNSON

vs.

CHARLES JOHNSON

CHARLES JOHNSON *

vs.

* Cross

ISABELLE JOHNSON * bill

Recorded

~~Folio 292 1927~~

Decree of Divorce

B No. 30686
(13)

fd 13 Dec 1929

The within is a proper decree to be passed in
this case

William P Lyons
Auditor and Master

Circuit Court

OF

BALTIMORE CITY,

ISABELLE JOHNSON

VS.

CHARLES JOHNSON

CHARLES JOHNSON

vs.

ISABELLE JOHNSON

* Cross bill

Term, 192

This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered.

It is thereupon, this 13th day of December, A. D. 1929 by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

CHARLES JOHNSON, in the cross bill the above named Complainant/ he and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, in the cross bill, ISABELLE JOHNSON.

AND it is further ordered that the original bill be, and it is hereby dismissed.

And it is Further Ordered, That the said Complainant in the cross bill, CHARLES JOHNSON, pay the cost of this proceeding.

Full Court

3/17/2/94

Doc. B 249
1929.

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

5.15
1/3

Charles J. Johnson
vs
Isabelle Johnson
and cross bill

No. B 30686.
(10)

PLAINTIFF'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$ _____

DEFENDANT'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$ _____

Ad 3 Dec 1929

.....
Charles J. Johnson.....
vs.
Isabelle Johnson, and.....
cross bill.....

In the Circuit Court.....
OF BALTIMORE CITY.

The above cause being at issue,.....

and notice having been given me by the Solicitor for the plaintiff.....
of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
virtue of an order of the above named Circuit Court, passed in said cause on the
thirtieth day of July 1929, met on
the thirty-first day of July in the year nineteen
hundred and twenty-nine at my office, in the city of Baltimore, in the State
of Maryland, and assigned the first day of August
in the same year at 3:00 o'clock in the after-noon and the
office of Allan Eli Cohan, Esquire, in the City and State
aforesaid, as the time and place for such examination of witnesses in said cause;
at which last mentioned time and place I attended, due notice of such meeting
having been given, and proceeded in the presence of the Solicitor..... of the
plaintiff..... to take the following depositions, that
is to say:—

CHARLES J. JOHNSON : In the Circuit Court of

VS.

ISABELLE JOHNSON : Baltimore City.
and Cross-Bill

- - - - -

Testimony taken before me, A, DeRussy Sappington, Examiner, in the offices of Allan Eli Cohan, Esquire, in Baltimore, on August 1st, 1929, at 3:00 P. M.

Mr. Allan Eli Cohan appeared for plaintiff in cross-bill.

- - - - -

Thereupon---

CHARLES J. JOHNSON,
the plaintiff, of lawful age, produced on his own behalf, being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation.

A Charles J. Johnson, 1313 Myrtle Avenue, Baltimore, barber.

Q Do you know the parties to this suit?

A Yes, sir, I am the plaintiff in cross-bill and my wife is the defendant.

By Mr. Cohan:

Q When, where and by whom were you married?

A In Baltimore, Maryland, on September 15th, 1922, by the Reverend E. B. Elliott.

Q Have you been a resident of Baltimore, Maryland, for more than two years prior to the filing of this Bill?

A Yes, all my life.

Q Is your wife a resident of Maryland?

A Yes.

Q Were any children born as a result of the marriage?

A No.

Q How did you treat your wife?

A I treated her good. I had a home for her and supported her and was good to her.

Q Were you always a kind, faithful and affectionate husband to her?

A Yes.

Q Are you living together now?

A No.

Q Which one of you left the other?

A She left me.

Q When did she leave you?

A On December 21st, 1924.

Q What were the circumstances of her leaving?

A She wanted to run around and stay out late at nights and I got after her about it and she packed up and

left.

Q Have you ever lived or cohabited together since your wife left you on September 21st, 1924?

A No, sir.

Q Did you give your wife any cause or reason to leave you?

A No.

Q Has her abandonment of you continued uninterrupted-ly from September 21st, 1924, until the present time?

A Yes, sir.

Q Do you believe it is deliberate and final and beyond any hope of reconciliation?

A Yes, sir.

- - - - -

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this your examination, or the matters in question between the parties? If so, state the same fully and at large in you answer.

A. ---

Charles J. Johnson

Thereupon--

MAMIE JOHNSON,

a witness, of lawful age, produced on behalf of the plaintiff, being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation.

A Mamie Johnson, 908 McCulloh Street, Baltimore, housewife.

Q Do you know the parties to this suit?

A Yes, I am his stepmother.

By Mr. Cohan:

Q Did you attend their wedding?

A No.

Q Do you know they lived together as husband and wife and held themselves out as husband and wife?

A Yes, sir.

Q Has he been a resident of Baltimore, Maryland, for more than two years prior to the filing of this Bill?

A Yes, sir.

Q Is his wife a resident of Maryland?

A Yes.

Q Were any children born as a result of the marriage?

A No, sir.

Q How did he treat his wife?

A He treated her nice.

Q Was he always a kind, faithful and affectionate husband to his wife?

A Yes, sir.

Q Which one of them left the other?

A She left him.

Q When did she leave him?

A On December 21st, 1924.

Q What were the circumstances of her leaving?

A She came to the house one morning and rang the bell and came in and told me she was going to leave him and she left.

Q Did he give her any cause or reason to leave?

A No, sir.

Q Have they ever lived or cohabited together since she left him on December 21st, 1924?

A No, sir.

Q Has her abandonment of her husband continued uninterruptedly from December 21st, 1924, until the present time?

A Yes, sir.

Q Do you believe it is deliberate and final and beyond any hope of reconciliation?

A Yes, sir.

- - - - -

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. --- No *Mamie L Johnson*
mark

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the plaintiff.....

closed the depositions taken in said cause and now return them closed under my hand and seal, on this 2nd.....day of December.....

in the year of Our Lord nineteen hundred and twenty-nine.....at the City of Baltimore, in the State of Maryland.....

*A. de R. Sappington, Examiner,
per Merris Moorfit.*
..... (SEAL).
Special Examiner.

Per _____
Special Examiner.

There are no..... Exhibits with these depositions, to wit:
Plaintiff's..... Exhibit.....

Defendant's..... Exhibit

A. de R. Sappington
..... Examiner.
Per *Merris Moorfit*
Special Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two..... days, on both..... of which I was employed by the Plaintiff....., and on none..... by the Defendant.....

A. de R. Sappington
..... Examiner.
Per *Merris Moorfit*
Special Examiner.